Huang 2000-0221

REMARKS

Claims 17 and 18 were rejected under 35 USC 101. The Examiner asserts that the rejected claims present an abstract idea without reduction to practical application. Applicants respectfully traverse, but nevertheless amend claim 17 to more clearly define the practical application.

It is often desirable to know whether received data belongs to a particular source, such as when a speech segment is received, speech of different speakers is pre-stored, and it is desirable to know to which of the different speakers the received speech segment belongs. This is the very practical application to which claim 17 is directed where, a "chosen data segment" is analyzed vis-à-vis segments of "stored data," and a determination is made and outputted regarding the relationship/association/kinship of the chosen data relative to the analyzed pre-stored segments of data. Applicants believe that amended claim 17, and consequently claim 18, are in compliance with 35 USC 101.

Claim 1-26 were rejected under 35 USC 102 in view of Beigi et al, US Patent 6,246,982. This rejection was addressed in the previous Office Action response but, apparently, the Examiner did not focus on applicants' arguments but, rather addressed arguments make in a previous Office Action response. This conclusion is reached because, in the "Response to Arguments" section, the Examiner states

> Applicant has indicated that the distance measurement between the probability density function is carried out using *Kullbck Leibler Distance*...

and goes on to argue that Beigi et al teach such a measure.

In fact, the last response by applicants, dated February 12, 2004 makes no such argument, presenting instead a totally different argument as to why Beigi et al do not anticipate the claims.

The following presents essentially the same argument that was presented in the aforementioned February 12 amendment, and it is hoped that the argument is concise, well focused, and clear.

At col. 4, lines 26-28, Beigi et al state:

> The "inter-collection" distance between collections A and B is computed by determining which n-dimensional distribution of collection B has the closest distance to each individual n-dimensional distribution of collection A, and vice versa. The inter-collection

distance is essentially a weighted sum of these closest "inter-distribution" distances.

That means that, a member in collection B is selected for each member in collection A, the selected collection B member being the one with the closest in distance to the member of collection A. A weighted sum is formed once a member from collection B is chosen for each member of collection A. Thus, for example, if collection A has 8 members, and collection B has 20 members, the formed sum comprises 8 (weighted) distances.

In contradistinction, claim 1 specifies a distance measure of

$$D_M(G,H) = \min_{w=\{\omega_{ik}\}} \sum_{i=1}^{N} \sum_{k=1}^{K} \omega_{ik} d(g_i, h_k),$$

which clearly is a different distance measure. Therefore, Beigi et al do not anticipate claim 1. The same argument applies to all of the other independent claims.

In view of the above amendments and remarks, applicants respectfully submit that all of the Examiner's rejections have been overcome. Reconsideration and allowance are respectfully solicited.

Respectfully,
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